DECLARATION OF DARYL SEAH ISO GOOGLE LLC'S MOTION FOR RELIEF RE PRESERVATION

Redacted Version of Document Sought to be Sealed

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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4 | CHASOM BROWN, et al., on behalf of themselves and all others similarly situated,

5 | Plaintiffs,   Case No. 4:20-cv-03664-YGR-SVK

6 | vs.

7 | GOOGLE LLC,

8 | Defendant.

9 | PATRICK CALHOUN, et al., on behalf of themselves and all others similarly situated,

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11 | Plaintiffs,   Case No. 4:20-cv-05146-YGR-SVK

12 | vs.

13 | GOOGLE LLC,

14 | Defendant.

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DECLARATION OF DARYL SEAH

17   1.   I am a Software Engineer and lead on the Ads Identity and Infrastructure team within

18 Ads at Google LLC. I have worked on teams in the Ads business since joining Google in 2015, and

19 on the Ads Identity and Infrastructure team (including under the names "Display Ads Identity" team

20 and "Unified Identity Service") since 2017. I am an engineer and in my current position my job

21 responsibilities include developing and maintaining systems to support the Google Ads business.

22 As part of my duties, I am familiar with the use by Google of identifiers for advertising purposes

23 and tables used for the purpose of mapping or linking those identifiers. I make this declaration based

24 on personal knowledge and knowledge acquired from my co-workers, and if called to testify, I could

25 and would competently testify to such facts.

26   2.   I understand the Court issued preservation orders in the above-captioned cases,

27 requiring Google to preserve "all mapping and linking tables."

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3.   The Ads Identity and Infrastructure team, whose responsibilities include support for Google Ads (including Display Ads, Search Ads, and YouTube Ads), uses terms like "mapping table" and "linking table" to refer to specific data structures that contain user or device identifier mappings or linkings used by the Google Ads business. However, I am not aware of a company-wide definition of "mapping table" or "linking table." Based on my experience at Google, gained in my current role and in various positions I have held over the past seven years, I expect that if there were such a company-wide definition of "mapping table" or "linking table" at Google, I would have become aware of it.

4.   My colleagues on the Ads Identity and Infrastructure and other Ads teams worked to identify tables that contain a mapping or linking of user or device identifiers, and we have identified and are working on preserving ▮ tables. Google does not retain any of these tables permanently in the ordinary course of business; instead they are maintained from ▮▮▮▮.

5.   Among the identified tables, ▮▮ are linking tables relating to the project known internally by the Google Ads team as ▮▮▮▮▮

▮▮▮▮▮▮▮▮

6.   I further understand that, at a hearing on August 4, Plaintiffs' counsel referred to Google documents that purportedly describe "mappings between identifiers," "[e]xamples of identifier mapping," and ▮▮▮▮ and referred specifically to a "Biscotti to GAIA" mapping. I understand Plaintiffs have referred to documents produced by Google with the following beginning bates numbers: GOOG-CABR-04726868 and GOOG-CABR-04469819. I have been provided and have reviewed those documents.

1   7.   The above-referenced documents describe certain identifier mappings or linkings

2 that were discussed by teams within the Google Ads business, but were not implemented by Google.

3 For example, the second page of the document titled ██████████████████████ (GOOG-

4 CABR-04726868) describes a "Biscotti to GAIA" mapping that was not implemented by Google.

5 Similarly, in the document produced as GOOG-CABR-04469819, on the fifth page (ending in

6 number -823) there is a reference to "Mapping from IDFA/ADID/Biscotti to GAIA." Google did

7 not implement a mapping from ADID or Biscotti to GAIA. IDFA is an Apple identifier used for

8 advertising purposes, and Google only implemented a mapping from IDFA to GAIA for versions of

9 iOS (Apple iPhone) prior to iOS 14.

10   8.   I provide the above descriptions of mappings and linkages referenced in the

11 documents that were not implemented by Google merely as examples. Because the documents

12 describe proposals for systems that were not implemented, or were only implemented in part, there

13 are other portions of the descriptions, not enumerated above, that do not accurately reflect the

14 systems that Google has actually implemented.

16   I declare under penalty of perjury that the foregoing is true and correct.

17   Executed on the 18th day of October 2022 at Mountain View, California.

By: *Daryl Seah*
DocuSigned by:
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Daryl Seah

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SEAH DECLARATION